

## COMMENTS OF THE SOLAR ENERGY INDUSTRIES ASSOCIATION REGARDING DRAFT REVISIONS TO THE ILLINOIS NET METERING RULE (Part 465)

July 19, 2013

The Staff of the Illinois Commerce Commission are seeking informal comments to inform a pending rulemaking to update the Illinois net metering rules at 83 Ill. Adm. Code Part 465. The Solar Energy Industries Association ("SEIA")<sup>1</sup> has reviewed the June 28, 2013 draft rule amendments. SEIA appreciates the opportunity to comment in this pending rulemaking.

Established in 1974, the SEIA is the national trade association of the U.S. solar energy industry. Through advocacy and education, SEIA is working to build a strong solar industry to power America. As the voice of the industry, SEIA works with its 1,000 member companies to make solar a mainstream and significant energy source by expanding markets, removing market barriers strengthening the industry and educating the public on the benefits of solar energy. SEIA supports and advocates for all forms of solar energy generation, including both distributed and central-station generation.

Adopted in 43 states and the District of Columbia, net metering is a fundamental policy for enabling customer-sited distributed solar generation. The simplicity and understandability of net metering have been pivotal in reducing barriers to consumer uptake of energy technologies such as solar, and is arguably one of most successful market transformation policies for the renewable energy economy.

Furthermore, customer-sited solar generation enabled through the net metering billing arrangement offers many benefits to the electric utility system and by extension to non-solar customers, including but not limited to: reduction in utility energy and capacity generation requirements, particularly during peak periods; reduction in system losses; avoidance or deferral of distribution and transmission

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<sup>&</sup>lt;sup>1</sup> The comments contained in this filing represent the position of the SEIA as an organization, but not necessarily the views of any particular member with respect to any issue.



investments; localized grid support, including enhanced reliability benefits; fuelprice certainty; and reduction in air emissions and water use.<sup>2</sup>

SEIA has reviewed and fully supports the informal comments that the Environmental Law and Policy Center (ELPC) has submitted in this instant matter. SEIA hopes that Commission Staff seriously consider their recommendations when updating Illinois's net metering rules.

Respectfully submitted,

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<sup>&</sup>lt;sup>2</sup> Central-station solar projects also bring fuel-price certainty, reductions in air emissions and water use, and reductions in utility energy and capacity generation requirements.